
U.S. Department of Energy
Office of Environmental Management
Grand Junction, Colorado



MOAB UMTRA PROJECT
DOE OVERSIGHT PLAN

Revision 2

May 2019

Department of Energy Oversight Plan
Revision 2

DOE Approval:

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Revision History

Revision	Date	Reason/Basis for Revision
0	July 2014	Initial issue provides a description of DOE oversight at the Moab UMTRA Project and addresses issues identified in the 2013 Integrated Safety Management System Assessment.
1	May 2015	Revision update includes addition of detail regarding types and methods of oversight performed, qualifications for oversight personnel, the oversight reporting process, and identification of EMCBC procedures to be used by Moab DOE and contractor oversight support staff to conduct oversight.
2	May 2019	Periodic update to reflect current processes and DOE organizational positions.

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1.0 Introduction

1.1 Purpose

The U.S. Department of Energy (DOE) Oversight Plan provides a consolidated oversight philosophy and structure for the DOE Moab Uranium Mill Tailings Remedial Action (UMTRA) Project operations. This Plan defines DOE activities and responsibilities that ensure the adequacy and effectiveness of DOE oversight as it pertains to DOE Order (O) 226.1B, “Implementation of Department of Energy Oversight Policy,” and describes how DOE meets the requirements of the *EM Quality Assurance Program* (QAP) (EM-QA-001) and Criterion 9 – Assessment/Management Assessment and Criterion 10 – Assessment/Independent Assessment of DOE O 414.1D, “Quality Assurance.”

Consistent with DOE O 226.1B, the authority for establishing, approving, providing oversight of, and implementing the Plan resides with the Moab Federal Cleanup Director (FCD). Authority for establishing and implementing portions of the Plan has been further delegated by the FCD to others participating in the Project, with responsibility for the adequacy of their performance retained by the FCD.

1.2 Scope

The Plan applies to oversight activities performed by the DOE and the DOE’s Technical Assistance Contractor (TAC) oversight support staff and covers all Moab Project work activities including, but not limited to, quality assurance (QA), integrated safety management (including the environmental management system), integrated safeguards and security management, cyber security, and emergency management.

DOE oversight encompasses activities performed to determine whether federal and contractor programs and management systems, including assurance and oversight systems, are performing effectively and/or complying with DOE requirements. DOE oversight programs include operational awareness activities, on-site reviews, assessments, self-assessments, performance evaluations, contractor assurance system reviews, and other activities that involve evaluation of the DOE and contractor organizations at the Project.

2.0 Project and Contractor Scope

The scope of the Project is to relocate uranium mill tailings and other contaminated materials, collectively known as residual radioactive material, from the former Moab millsite in Utah to a DOE-constructed disposal facility near Crescent Junction, Utah. The scope also includes remediation of the contaminated ground water at the Moab site and contaminated properties in the vicinity of Moab.

The Remedial Action Contractor (RAC) performance work statement includes: moving the tailings from the Moab site to the permanent disposal site at Crescent Junction (CJ), using existing tailings removal and transportation systems, annually relocating the amount of mill tailings indicated in the contract, and placing the tailings in the CJ disposal cell. The RAC is responsible for managing the day-to-day operations at both the Moab and CJ sites.

The TAC Scope of Work is to provide technical and administrative support services to DOE, including environment, safety, health, and quality within its own organization and programmatically for the Project, records management, training, information technology/telecommunications, infrastructure, public affairs, real and personal property management, document production, planning and financial integration, change-control administration, and security.

The TAC also performs geologic evaluation of the Moab and CJ sites, independent verification of off-pile areas, ground water remediation, maintenance of native vegetation, and weed control at the Moab site; the TAC also monitors standpipe and observation wells at the CJ site, and performs inclusion/exclusion surveys and independent verification of remediation on vicinity properties.

Additionally, the TAC performs oversight of the RAC, in support of DOE and this Plan, including Assessment/Management Assessment, Independent Assessment, and operational awareness activities.

3.0 Operations Oversight

Moab DOE, with support from TAC oversight staff, performs oversight to maintain sufficient knowledge of site and contractor activities to make informed decisions about hazards, risks, and resource allocation, provide direction to contractors, and evaluate contractor performance. The effectiveness of contractor assurance systems (CASs), the hazards at the site/activity, and the degree of risk are factors in determining the scope and frequency of DOE assessments and operational awareness activities.

3.1 Assessment Personnel

Assessment personnel facilitate continuous process improvement by identifying programs, systems, and processes that can be improved and by providing information to management. Management shall ensure personnel possess the experience, knowledge, skills, and abilities necessary to discharge their responsibilities. The assessor should be able to collect performance data through interviews, document reviews, observation, and inspection. It is very important that the assessor also be able to communicate effectively, both orally and in writing, and demonstrate effective interpersonal skills.

Both management and independent assessments should be performed by qualified individuals who are knowledgeable about the program, system, or process being assessed and have been trained to ensure full understanding of the assessment processes, including reporting.

Individuals performing independent assessments should not currently perform, supervise, or have direct responsibility for performing the activities being assessed. Independence is determined based on an individual without bias rather than on organizational affiliation. The independent assessor should have both the personal and organizational freedom to communicate with the management of the assessed organizations.

The Environmental Management Consolidated Business Center's (EMCBC's) "Qualification of Assessment Personnel" (SAP-OTSAM-414D-01) establishes responsibilities and processes for the indoctrination, training, and qualification of personnel who conduct Independent Assessments.

3.2 Assessment/Management Assessment

Management Assessment (e.g. Self-assessments and performance evaluations) is a method used to achieve continuous improvement and/or to identify barriers that hinder improved performance. Managers or personnel knowledgeable in the subject areas to be assessed periodically evaluate the performance of their organizations in comparison with their mission, responsibilities, and priorities. Assessments/Management Assessments include verifying roles and responsibilities are known and understood, processes and procedures are effectively implemented, appropriate measurement systems are in place and functional, evidence of continuous improvement is readily available, procedures are being complied with, organizational activities are consistent with the mission, and customer requirements and expectations are satisfied.

Assessments/Management Assessments can be a review, an evaluation, an inspection, a test, a check, or a surveillance to determine and document whether items, processes, systems, or services meet specified requirements and perform effectively. DOE Management expectations associated with Assessments/Management Assessments consist of:

- Assessments/Management Assessments are one of the means for identifying areas needing correction and/or improvement.
- Assessments/Management Assessments are performed by personnel knowledgeable in the subject area and trained in assessment techniques.
- Managers or personnel knowledgeable in the subject areas within organizations assess their organization's performance with regards to such things as safety, quality, mission completion, and performance against technical or financial goals and objectives.
- As part of the Assessment/Management Assessment process, DOE personnel ensure their QA programs are assessed to verify compliance and effectiveness of the quality requirements implementation.
- Results of Assessment/Management Assessments are documented, and Significant Deficiencies and Deficiencies identified and tracked with corrective actions taken.
- Corrective actions tracked by the DOE are done so using the SharePoint Issue Management Condition Report (CR) System.
- Assessment/Management Assessments use guidance provided in DOE Guide (G) 414.1-1C, "Management Assessment and Independent Assessment Guide."

3.3 Operational Awareness

Operational awareness activities are conducted on a day-to-day basis. These activities, also referred to as “boots on the ground,” include walkthrough, work observation, document review, meeting attendance and participation, and routine interaction with contractors and management with a goal of improving line management knowledge of contractor operations and work progress, effectiveness of contractor internal oversight programs, and contractor safety performance.

Personnel conducting operational awareness activities observe, evaluate, and report on the effectiveness of the operating contractor in multiple areas important to safe, efficient operations, such as operational performance, QA, management controls, emergency response readiness activities, and to ensure worker health and safety.

While these activities are not scheduled and documented using the formal Integrated Assessment Schedule (IAS), an oversight meeting is held at the beginning of each week to define the week’s oversight scope and ensure open and strong lines of communication between the DOE and TAC oversight support staff. Scope is dependent on current and planned contractor operations, changing conditions, identified weaknesses, emerging risk, and the results of recently performed oversight.

DOE EMCBC’s “Assessment/Management Assessment and Oversight” (SAP-OTSAM-414C-01), defines the process of conducting and documenting Management Assessments, Self-assessments and day-to-day operational awareness oversight activities. Additionally, operational awareness activities are documented in weekly reports prepared by both the DOE and TAC oversight support staff.

3.4 Assessment/Independent Assessment

Independent Assessments involve on-site reviews or assessments to determine and document whether items, processes, systems, or services meet specified requirements and perform effectively. An Independent Assessment is conducted by individuals within the organization or from an external organization who are independent from the work or process being evaluated. The scope and duration of the assessment determines the composition of the Independent Assessment Team. Assessment Teams may be as small as one Lead Assessor or as large as a Lead Assessor and a team of assessors.

DOE management expectations associated with Independent Assessments consist of:

- Organizations develop and implement a comprehensive plan and schedule to independently assess and conduct assessments of contractors against technical, programmatic, administrative, and quality program requirements.
- As part of the Independent Assessment process, DOE ensures DOE and contractor QA programs are compliant and effective.
- Independent Assessments are performed by personnel knowledgeable in the subject area and trained/qualified in assessment techniques and by personnel who do not have responsibility for performing the activities being assessed.
- Results of independent assessments are documented, Significant Deficiencies and Deficiencies tracked, corrective action plans (CAPs) reviewed, and corrective actions verified.

- Corrective actions tracked by DOE are done by using the SharePoint Issue Management Condition Report (CR) System.
- Independent Assessments use guidance provided in DOE G 414.1 1C.
- Assessments are often, at the discretion of the assessor, conducted using established Criteria Review and Approach Documents with lines of inquiry.

DOE EMCBC's "Independent Assessment," (SAP-OTSAM-414C-02), defines the process for conducting Independent Assessments of the DOE organization and DOE contractors.

3.5 DOE Safety Oversight

Oversight functions performed by DOE include two broad categories: (1) DOE field element oversight of DOE contractor activities, and (2) DOE field element Self-assessments of their own activities and functions. Routine DOE field element oversight of DOE contractor activities includes:

- Monitoring contractor compliance with requirements. Periodically examining contractor programs and their implementation at the work-activity level to assess if both DOE and external regulatory requirements are effectively met.
- Ensuring the adequacy of CASs. DOE reviews CASs periodically to ensure required assessments by applicable DOE directives are being performed, the effectiveness of safety management programs are being adequately assessed, Deficiencies are being self-identified, and corrective actions are being taken in a timely and effective manner.
- Evaluating contractor performance. Periodically evaluating contractor performance in accordance with the provisions of their contracts.
- Maintaining safety-related operational awareness.
- Identifying and addressing safety vulnerabilities and issues.
- Reviewing incident and occurrence reports.
- Observing work and attending site meetings (e.g., plan-of-the-day, daily tailgate safety. Integrated Work Plan/Job Safety Analysis review).

Oversight activities use the guidance provided in DOE G 226.1-2A, "Federal Line Management Oversight of Department of Energy Nuclear Facilities," and DOE O 226.1B.

3.6 Grading Issues

Results of DOE oversight and documented issues are graded based on their significance as follows:

- ***Significant Deficiencies*** – Deficiencies that, if uncorrected, could have a serious effect on the environment, safety, health, security, or operational integrity. This includes Significant Conditions Adverse to Quality. In addition, an "Extent of Condition" determination should be considered. Significant Deficiencies shall be tracked, CAPs approved, and corrective actions verified.
- ***Deficiencies*** – Non-compliances with procedural, contractual, or regulatory requirements identified during an assessment. This includes Conditions Adverse to Quality. They are used to indicate inadequacies or safety issues that warrant management attention. Deficiencies shall be tracked, CAPs approved, and corrective actions verified.

- **Observation** – A condition that should be brought to the attention of line management, but does not meet the definition of a Deficiency. Observations are typically a condition that, if left uncorrected, could lead to a Deficiency.
- **Comment** – Comments are simply statements of fact that are noteworthy. Comments can be positive or negative, including opportunities for improvement, and noteworthy practices.

3.7 Integrated Assessment Schedule

To determine the scope and frequency of DOE oversight assessments, an IAS (see Attachment 1) is developed each fiscal year. The schedule ensures mandatory assessments are performed and that appropriate oversight is conducted based on the hazards, risk, and complexity of upcoming work scope. Specifically, the IAS ensures all DOE and/or regulatory-required assessments are scheduled and performed, the effectiveness of safety management programs are evaluated at an appropriate depth and frequency, and additional assessments are performed based on the results of trend analysis and performance indicators/measures.

4.0 Oversight Reporting

When oversight activities identify Significant Deficiencies or Deficiencies, they are promptly reported to management of the assessed organization; verbal notification and early communication is key to promptly addressing conditions adverse to the environment, safety, health, or quality.

Draft Assessment/Management Assessment and Operational Awareness Reports are prepared and transmitted to the DOE FCD and DOE Environmental, Safety, and Health, and Quality Assurance (ESH/QA) Manager for their review. The assessor or assessment team lead will work with the DOE FCD and DOE ESH/QA Manager to resolve any comments received from their review. The “final draft” of the assessment report (i.e., completed but not signed by the assessor) is then emailed to the contractor(s) by the DOE ESH/QA Manager for factual accuracy review with a copy sent to the FCD.

- The factual accuracy review should be completed within 7 working days, but time allowed may vary based on DOE discretion.
- The contractor may discuss any items requiring clarification with the assessor during the accuracy review.
- Any comments resulting from the factual accuracy review are sent to the DOE ESH/QA Manager who works with the assessor or team lead to resolve those comments.

The assessor revises the assessment if necessary and submits the final assessment report to the ESH/QA Manager, FCD, and executive administrative support for formal transmittal to the contractor(s). On a monthly basis, all final assessment reports received for oversight conducted the previous month, including any issue report forms (FM-OTSAM-414C-01-F2), will be transmitted as attachments to a letter issued by the FCD to the contractor(s).

The transmittal will require contractor CAPs for each Significant Deficiency and Deficiency identified. DOE approval is required for all Significant Deficiencies identified. CAPs shall be tracked to closure by the contractor and verified closed by a representative of the DOE.

Attachment 1.
Sample Fiscal Year Integrated Assessment Schedule

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1 ST QUARTER (October – December)					
Type	Activity	Requirement	Assessor	Assessee	Report No.
QA Program					
A	QA Corporate Performance Metrics QA Self-Evaluation	ISMS/QA Declaration	DOE, RAC, TAC	Project	Not required per ISMS Declaration Guidance.
851 Worker Safety and Health Program					
A	Annual Confined Space Program Review	OSHA	TAC	TAC	Moved to 3 rd quarter.
AU	Safety Delegation Review	EMCBC Requested		Project	Postponed.
A	Annual Lockout/Tagout Program Review	OSHA	TAC	TAC	Moved to 2 nd quarter.
A	IH Monitoring	QAP		RAC	MB-19-A-003
MA	Emergency Management Program replaced Hearing Conservation	Procedure Requirement		RAC	MA-19-004
Radiation Protection Program					
MA	Radiological Work Planning	10 CFR 835		RAC	MA-19-001
A	Reach Stackers and Container Survey Racks/Containers Entering/Exiting Moab Project replaced Internal Dosimetry	10 CFR 835		RAC	MB-19-A-002
Emergency Management					
A	Emergency Readiness Training Planning	DOE O 150.10 Annual Requirement	Project	Project	DOE-19-A-001
A	Continuity of Operations Planning	DOE O 150.10 Annual Requirement	Project	Project	DOE-19-A-002
Integrated Safety Management System					
A	Contractor Assurance System Report	DOE O 210.2A	RAC/TAC	RAC/TAC	DOE-19-A-003
Incident Occurrence Reporting					
A	Incident Reporting (ORPS & CAIRS)	DOE O 210.1B	RAC/QA	RAC	MB-19-A-001
A	Incident Reporting (ORPS & CAIRS)	DOE O 210.1B		TAC	DOE-19-A-004
MA	Quarterly Performance Analysis Report	DOE O 210.2A	DOE	Project	DOE-19-MA-001
Site Operations					
A	Interim Completion Report	Contract Deliverable		RAC	DOE-EM/GJRAC2040-H
A	Disposal Cell	QAP		RAC	DOE-19-A-005
MA	Crescent Junction Operations	Procedure Requirement		RAC	MA-19-005
MA	Excavation and Conditioning	Procedure Requirement		RAC	MA-19-002
Logistics, Property, and General Administration					
A	Site Sustainability-End of Year Review	DOE O 436.1	DOE/TAC	Project	DOE-19-A-006
A	Personal Property	EMCBC Request		Project	DOE-19-AU-001
A	Personal Property	Procedure Requirement		Project	DOE-19-A-007
AU	Continuous Monitoring IT	DOE O 205.1B	DOE HQ/EMCBC	TAC	DOE-19-AU-002
Project Management					
MA	Transportation	Procedure Requirement		RAC	MA-19-003